



Re: Approval on Additional PDI Work

Mary Logan to: Lawrence, Charles

10/06/2009 09:34 AM

Cc: Sheila Abraham, Rainer Domalski, "Finn, Steve", "McCullen, Kevin"

From: Mary Logan/R5/USEPA/US
To: "Lawrence, Charles" <Charles_Lawrence@golder.com>
Cc: Sheila Abraham <sheila.abraham@epa.state.oh.us>, Rainer Domalski <RDomalski@ruetgers-organics-corp.com>, "Finn, Steve" <steve_finn@golder.com>, "McCullen, Kevin" <Kevin_McCullen@golder.com>

Hi Charlie,

As we discussed this morning, I am going to be out of reach most of this week. Therefore, I cannot get you a formal approval letter for the additional proposed PDI work until next week. However, the Agencies want to see the work proceed, so this email will function as a conditional approval for certain work.

I am conditionally approving the following additional PDI work:

1. The Agencies concur with proposed additional downgradient well at TW09-49. Depending on the results, additional delineation may be required.
2. The additional mirex soil sampling is approved with one condition. The Agencies recommend adding an additional sample to the north of the four proposed samples on the western side, beyond A28.

The Sampling Plan refers to following the soil sampling protocol established for mirex soil sampling in the OU2 Pre-Design Work plan. Following that protocol, debris and vegetative matter above the soil horizon will be removed, and the soil underneath sampled to a total depth of 1 foot. This is acceptable for situations similar to what exist on-property, i.e., where the soil horizon has not been altered by landscaping, re-contouring, or the addition of soil amendments such as top soil.

However, it is not known if the off-property areas proposed to be sampled (beyond A28 and A29) have been altered, for example, by landscaping—i.e., if the top one foot actually represents the soil horizon potentially impacted by mirex run-off from the Nease facility.

The Agencies recommend that the property owners be asked for information on whether landscaping activities occurred in the areas proposed to be sampled. The soil sampling plan should be modified as necessary, to target the areas where mirex might have been deposited.

Please coordinate with Ohio EPA on the work schedule to allow for their oversight.

Please let me know if you have any questions.

Mary

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—"Lawrence, Charles" <Charles_Lawrence@golder.com> wrote: —

To: Mary Logan/R5/USEPA/US@EPA, Sheila Abraham <sheila.abraham@epa.state.oh.us>
From: "Lawrence, Charles" <Charles_Lawrence@golder.com>
Date: 10/05/2009 02:06PM
cc: Rainer Domalski <RDomalski@ruetgers-organics-corp.com>, "Finn, Steve" <steve_finn@golder.com>, "McCullen, Kevin" <Kevin_McCullen@golder.com>
Subject: Approval on Additional PDI Work

Mary, Sheila,

We are planning to complete the final post-injection groundwater sampling event associated with the NZVI pilot test the week of October 12th. This same week Golder will also be sampling for low-level mercury.

In the interest of being cost effective with our field effort, we were hoping to also complete the additional well installation at _____ and the further mirex soil delineation this same week, as proposed in our letters dated September 14, 2009 and September 18, 2009, respectively.

If you would like to discuss either of these additional PDI efforts please feel free to contact me.

Thank you for your consideration,

Charlie

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